



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMORANDUM ENDORSED

BY ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 8, 2022

USDC SDNY
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Re: United States v. Serrano, 21 Cr. 785 (GHW)

Dear Judge Woods:

The parties write jointly to request a brief adjournment of the status conference in this case scheduled for Tuesday, July 12, 2022. The parties are in advanced plea discussions and anticipate reaching a disposition shortly, but not by July 12. Accordingly, the parties respectfully request that the Court adjourn the status conference. The parties are both available July 20, if that date is convenient for the Court. Otherwise, the Government can be available at any date after July 20 that is convenient for the Court.

If the parties reach a plea agreement, the parties will inform the Court before any rescheduled status conference that the conference should be converted to a plea hearing.

The Government respectfully requests that the Court exclude speedy trial time from July 12, 2022 through the rescheduled status conference date. An exclusion is in the interest of justice because it will allow the parties to discuss potential dispositions for this case.

Application denied without prejudice. This application does not fully comply with the Court's Individual Rules of Practice in Criminal Cases. In particular, it does not expressly state the defendant's position regarding the exclusion of time, and it does not present a proposed order for the exclusion by: _____/s/ _____ of time under the Speedy Trial Act. See Individual Rule 2(E). Any renewed application should address those matters. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 21. SO ORDERED.

Dated: July 10, 2022
New York, New York

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

Matthew R. Shahabian
Assistant United States Attorney
(212) 637-1046


GREGORY H. WOODS
United States District Judge